

# EXHIBIT A

JANE SULLIVAN, PH.D.  
P. POE 5 vs UNIVERSITY OF WASHINGTON

February 28, 2025

1

UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF WASHINGTON

AT SEATTLE

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P. POE 5, and P. POEs 2	)	No.
through 4 and 6 through 75,	)	2:24-cv-00170-JHC
individually and on behalf of	)	
others similarly situated,	)	
Plaintiffs,	)	
vs.	)	
UNIVERSITY OF WASHINGTON, a	)	
Washington public corporation;	)	
PERRY TAPPER, Director of	)	
Public Records and Open Public	)	
Meetings at the University of	)	
Washington, in their official	)	
capacity,	)	
Defendants,	)	
And	)	
PEOPLE FOR THE ETHICAL	)	
TREATMENT OF ANIMALS, INC., a	)	
Virginia nonstock corporation,	)	
and NORTHWEST ANIMAL RIGHTS	)	
NETWORK, a Washington	)	
nonprofit corporation,	)	
Intervenor-Defendants.	)	

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Videotaped

Deposition Upon Oral Examination Of

JANE SULLIVAN, Ph.D.

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February 28, 2025, 825 Fourth Avenue, Suite 3950,  
Seattle, Seattle

REPORTED BY: PEGGY FRITSCHY HAMILTON, RPR, CSR

Washington 29906/No. 2704/Oregon 230114

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12  
13  
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1 E X H I B I T S

2 NO.	DESCRIPTION	MARKED
3 1	Declaration of Dr. Jane Sullivan RE:	11
4	Plaintiffs' Motion For Preliminary	
5	Injunction	
6 2	December 17th, 2024 A draft message	18
7	for the IACUC	
8 3	Messages	20
9 4	Email thread, top email December 17,	36
10	2024 to Jessica Creighton, and	
11	others, from Sally Thompson-Iritani	
12 5	Email chain, top email December 28,	41
13	2024 to Craig Wilson, and others,	
14	from Sally Thompson-Iritani	
15 6	December 17, 2024 email to Undisclosed	44
16	recipients from Zak Rosencrantz	
17 7	December 24, 2024 email to Jennifer	48
18	Iwamoto and Sally Thompson-Iritani	
19	from Jennifer Iwamoto	
20 8	Messages	60
21 9	Email thread, top email December 17,	62
22	2024 to Wayne Johnson from Zak	
23	Rosencrantz	
24 10	December 18 2024 messages	64

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E X H I B I T S CONT'D

NO.	DESCRIPTION	MARKED
11	Email thread, top email January 8, 2025 to Sally Thompson-Iritani from Kevin Grossman	68
12	Email thread, top email February 5, 2025 to Kevin Grossman, and others, from Zak Rosencrantz	70
13	Event: Meet w/FBI	73
14	Email thread, top email December 13, 2024 to Sally Thompson-Iritani, and others, from Sally Clark	89
15	Email thread, top email to OAW Director from Zak Rosencrantz	90
16	December 31, 2024 Standing Item Reminders	92
17	January 7, 2025 Standing Item Reminders	97
18	January 10, 2025 email to Jennifer Iwamoto, and others, from Jane Sullivan	101

E X A M I N A T I O N

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\*\*\*\*\* (\* Denotes phonetic spelling.)

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Seattle, Seattle; Friday, February 28, 2025

10:35 a.m.

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THE VIDEOGRAPHER: Good morning. We are on the record. Today's date, February 28th, 2025, and the time is 10:35 a.m. This is the video-recorded deposition of Dr. Jane Sullivan, in the matter of P. POE 5 versus UW, case number is 2-24-cv-00170-JHC, in the United States District Court for the District of Washington. This deposition is being held at Goldfarb & Huck, Roth Riojas, PLLC, at 925 Fourth Avenue in Suite 3950 in Seattle, Washington, 98104.

The reporter's name is Peggy Hamilton. My name is Gabe Fabens. I'm the certified legal videographer. And today we are here with Esquire Deposition Solutions.

Would the attorneys present please introduce themselves.

ATTORNEY HAWKES: Peter Hawkes of Angeli & Calfo, on behalf of intervenor-defendants, PETA and NARN.

ATTORNEY SMITH: Asher Smith of the PETA Foundation, also on behalf of PETA.

ATTORNEY ROBERTS: Are you not noting Ms. Fox?



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1 anything else that might impede your ability -- your  
2 recollection or your ability to testify truthfully and  
3 completely today?

4 A. No.

5 Q. Is there any other reason that you wouldn't  
6 be able to testify truthfully and completely today,  
7 based on your personal knowledge?

8 A. No.

9 ATTORNEY HAWKES: We'll mark our first  
10 exhibit.

11 (Exhibit 1 marked for identification.)

12 Q. The court reporter has just handed you what  
13 has been marked as Exhibit No. 1 to your deposition.  
14 Do you recognize this as a copy of your most recent  
15 declaration in this case?

16 A. Yes.

17 Q. Okay. I just want to walk through a couple  
18 of things in your declaration. Let's start with  
19 paragraph 4. In paragraph 4 you describe an incident  
20 in September of 2024, where persons described as PETA  
21 supporters interrupted a keynote speech of Elizabeth  
22 Buffalo; do you see that?

23 A. Yes.

24 Q. Were you personally present for that?

25 A. I was not.



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1 Q. Are you aware whether there was any threats  
2 of violence made by PETA supporters at that, at that  
3 keynote speech?

4 A. I only know what, what I have, I have read  
5 in, in media reports about the incident.

10:43:23

6 Q. Okay. Have you read anything in media  
7 reports that indicated any violence on the part of any  
8 of the PETA supporters who were there?

9 A. I understand that, that they needed to be  
10 physically removed, but I don't know beyond that what  
11 kind of physical action or threatening action they,  
12 they took.

10:43:37

13 Q. Do you know whether they said anything  
14 indicating that they intended to commit any acts of  
15 physical violence against anyone at the, at the  
16 speech?

10:43:50

17 A. I don't know.

18 Q. So I want to turn now to paragraph 6 to 9 of  
19 your declaration. And these are the paragraphs that  
20 discuss the email that came in to the Office of Animal  
21 Welfare on or about December 13th of 2024. So you've  
22 got a copy of the email attached as Exhibit B to your  
23 declaration; is that right?

10:44:11

24 A. Yes.

25 Q. And turning to paragraph 8 of your

10:44:37

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1 declaration, you state, "Although the December 13th  
2 email to UW does not contain explicit threats, the  
3 menacing tone and Canis lupus sign-off was very  
4 frightening for me and other UW IACUC members who were  
5 targeted in the message."

10:45:07

6 What about this email contains a menacing  
7 tone? Can you explain that to me?

8 A. I think the vague menacing wording of, of  
9 many being willing to wait outside, and the address is  
10 just outside where the IACUC meetings are held, so  
11 they clearly know where we are meeting, and they are  
12 indicating that they are going to wait outside for us.  
13 I found that frightening.

10:45:40

14 Q. And that comes right after the request for  
15 the names of the IACUC members; right?

10:45:57

16 A. Yes.

17 Q. Couldn't that have been intended to convey  
18 that they would wait outside so that they could see  
19 who those people were by observing them walking in and  
20 out?

10:46:13

21 ATTORNEY ROBERTS: Object to the extent it  
22 calls for speculation.

23 A. Yeah, I don't know. I don't know what they  
24 intended. I only know how it landed.

25 Q. Okay.

10:46:22

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1 A. And we were very afraid.

2 Q. And there are -- and right after -- well,  
3 right before that it says, after, "Asking for the  
4 names to be released, but that information does not  
5 seem to be available. Please respond back." Is the  
6 use of the word "please" menacing? 10:46:37

7 A. It depends on how it was intended, whether it  
8 was sincere or if it was intended in a different way.

9 Q. And then the word "please" is again stated  
10 after the sentence that you referred to, about waiting  
11 outside the building for those who come and go, and  
12 then it says "please" again; do you see that? 10:46:58

13 A. I do.

14 Q. Again, does that indicate an intent to  
15 menace? 10:47:14

16 ATTORNEY ROBERTS: Same objection. Calls  
17 for speculation.

18 A. I have no idea what, what they intended to  
19 convey. I just know, again, this all landed and made  
20 everybody who read it afraid. 10:47:24

21 Q. And what in the -- what suggested that anyone  
22 is being -- that you or other IACUC members are being  
23 targeted?

24 A. Because they're referring to us, to IACUC  
25 members, and then signing off with Canis lupus. 10:47:41

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1 Q. Have you ever seen anything signed off

2 Canis lupus before?

3 A. No, I haven't.

4 Q. Okay.

5 A. Not when I usually get messages.

10:49:02

6 Q. Do you have any idea what was intended there,

7 really?

8 ATTORNEY ROBERTS: Same objection.

9 A. I don't know what the intention was. The

10 effect was to instill fear in everyone who read this

10:49:12

11 message.

12 Q. And you note in here that there's no explicit  
13 threats in this email; is that right?

14 ATTORNEY ROBERTS: Same objection.

15 Mischaracterizes the witness's testimony.

10:49:27

16 A. And also exactly what I acknowledged at the  
17 beginning of, I believe, paragraph 8.

18 Q. Okay. So to the extent you see this as a  
19 threat, that's based on you reading things into it,  
20 not based on what's actually there; right?

10:49:45

21 ATTORNEY ROBERTS: Same objection.

22 Go ahead.

23 A. Yeah, I think the tone is absolutely there.

24 I don't need to interpret. The language is, is

25 clearly menacing. Again, as I read it and every,

10:49:57

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1 thread. Do you see that there?

2 A. Yes, I do.

3 Q. At 11:52 a.m.?

4 A. Yep.

5 Q. And you're talking about the, how the

10:54:45

6 cancellation of the December IACUC meeting is going to

7 be communicated to the IACUC members; right?

8 A. Yes.

9 Q. And you say, "I'd like to remove, quote,

10:55:01

10 threatening, because it is a judgment call, and this

11 might need defending"; do you see that?

12 A. Yep.

13 Q. Okay. So you viewed it as a judgment call,

14 whether this would be considered threatening or not?

15 A. Yes. Explicitly threatening, yes. So I did

10:55:14

16 not see any explicit threats in that, in that message,

17 and that was what I was conveying there.

18 ATTORNEY HAWKES: We'll mark our next

19 exhibit.

20 (Exhibit 3 marked for identification.)

10:55:51

21 Q. And the court reporter has handed you what's

22 been marked as Exhibit 3. This is another Slack

23 thread. It's a little cut off at the top, but it

24 appears to be mostly on December 15th, I'm assuming.

25 Does that look right to you? At least earlier than

10:56:12

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1 A. Yes.

2 Q. And you say, "For the first time, I am now a  
3 little scared"; do you see that?

4 A. Yes.

5 Q. So prior to this email coming in, you had not  
6 been scared as a result of your role as the publicly  
7 known chair of the IACUC?

10:57:03

8 A. Before this, I did not feel directly and  
9 personally targeted by a threat for my safety. I knew  
10 that something like this was out there. I suspected  
11 that something like this could happen. But before  
12 this, we hadn't -- we did not have direct evidence.

10:57:28

13 So I was fearful that an individual who  
14 might hear misinformation from PETA would decide to  
15 take it into their own hands to take some, some kind  
16 of further action. This was direct proof that those  
17 fears were absolutely founded. But this was the first  
18 time that I personally directly felt threatened.

10:57:45

19 Q. Okay.

20 A. And that made me very afraid.

10:58:02

21 Q. Well, you say "a little scared."

22 A. This was the very first time I was seeing  
23 this, and so you know, it -- I -- the more I thought  
24 about it, the more times I read through that message,  
25 the more -- and the more I understood the implications

10:58:19

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1 information being introduced through her declaration  
2 about steps taken in response to the email.

3 ATTORNEY HAWKES: Well, I think it's a  
4 fair foundational question to be able to distinguish  
5 if she's taking some of these steps and she's adding 11:51:08  
6 ones afterwards, to be able to tell which is which.

7 ATTORNEY ROBERTS: Okay. I'm going to --  
8 I'm not going to instruct you not to answer. But I'm  
9 going to object to the extent it's beyond the scope  
10 and foundation. But go ahead. 11:51:20

11 ATTORNEY HAWKES: Okay.

12 Q. So focusing on before the email came in,  
13 which, if any of these steps had you taken personally?

14 ATTORNEY ROBERTS: And my objection is  
15 it's beyond the scope of the deposition, and 11:51:34  
16 foundation.

17 A. Right. I have not changed my safety  
18 practices since receiving -- since seeing that email,  
19 so I'm just -- I had internalized this message  
20 many years ago, and I use it to, to guide my 11:52:06  
21 practices. But nothing changed after I got that  
22 email. I was already doing all of the things that I  
23 normally do to limit my -- the exposure of my personal  
24 information.

25 Q. Do you know whether any other IACUC members 11:52:28

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1 meeting; do you see that?

2 A. Yes.

3 Q. Do you know why Dr. Johnson was personally  
4 notified of the cancellation?

5 A. Yes. Because Wayne signs up to speak during  
6 our public comments period at almost every IACUC  
7 meeting, and he had previously signed up to speak at  
8 the December meeting, and so we wanted to reach out to  
9 him to let him know that the meeting had been  
10 canceled, since he'd already signed up and been told  
11 he would be a, a public speaker.

11:58:34

11:58:52

12 Q. So Dr. Johnson is somebody who's known to  
13 you; right?

14 A. Yes.

15 Q. Okay. Would you characterize Dr. Johnson as  
16 an animal extremist?

11:59:03

17 A. Yes, I would.

18 Q. Why is that?

19 A. Because he holds extreme views about animals  
20 and the use of animals in research.

11:59:14

21 Q. Do you consider Dr. Johnson somebody who  
22 poses a potential threat to yourself, or other members  
23 of the IACUC?

24 ATTORNEY ROBERTS: Objection. Vague and  
25 ambiguous. Foundation.

11:59:28



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1 A. I'm not personally worried that Wayne is  
2 going to show up on my door and kidnap my cats, the  
3 way he suggested at an open public meeting. But I'm  
4 very worried that when Wayne speaks at our, at our  
5 meetings and talks about things like research on cats  
6 and reminds everybody of the names of my cats, that  
7 someone who hears him is going to take it upon  
8 themselves to come to my home and threaten my cats.

11:59:42

9 (Exhibit 10 marked for identification.)

10 ATTORNEY HAWKES: The next exhibit.

12:00:17

11 Q. What's been marked as Exhibit 10 is another  
12 Slack thread from December 18th of 2024. I don't see  
13 you on here, but do you know whether you were part of  
14 the group that this was sent to?

15 A. I was not on this Slack channel.

12:00:43

16 Q. You see in the last message from Zak  
17 Rosencrantz towards the bottom, he talks about letting  
18 Dr. Johnson know about the meeting cancellation. He  
19 says, "actually had a very nice back and forth with  
20 Wayne"; do you see that?

12:01:04

21 A. I do.

22 ATTORNEY ROBERTS: Take the time to read  
23 it, if you need to.

24 Q. You don't have any reason to believe that  
25 that wasn't an accurate characterization of their

12:01:15

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1 discussion; do you?

2 ATTORNEY ROBERTS: Objection. Foundation.

3 Calls for speculation.

4 A. Again, I'm not worried about Wayne showing up  
5 on my doorstep. I'm -- Wayne has -- I'm worried about  
6 the people who hear what Wayne says at our public  
7 meetings.

12:01:28

8 Q. I think you testified earlier that  
9 Dr. Johnson had threatened to kidnap your cats?

12:01:53

10 ATTORNEY ROBERTS: Objection to the extent  
11 it mischaracterizes what the witness said.

12 ATTORNEY HAWKES: We can go back and read  
13 the transcript, if you'd like.

14 Q. Did Dr. Johnson ever threaten to kidnap your  
15 cats?

12:02:06

16 ATTORNEY ROBERTS: Same objection.  
17 Mischaracterizes the witness's testimony.

18 A. No. He said that I would be upset if  
19 somebody came and kidnapped my cats, and referred to  
20 them by name at an open public meeting.

12:02:16

21 Q. Are you sure that's what he said?

22 ATTORNEY ROBERTS: Objection. Vague and  
23 ambiguous. Also asked and answered.

24 A. Yeah. That's the best of my recollection,  
25 that, yes.

12:02:27

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1 We're back on the record.

2 Q. Okay. Before that brief break, you were  
3 referring to what you recall as an occasion when  
4 Dr. Johnson had suggested that someone might kidnap  
5 your cats; is that correct?

12:04:27

6 ATTORNEY ROBERTS: Object to the extent  
7 it's beyond the scope of the deposition.  
8 Mischaracterizes the witness's testimony. Vague and  
9 ambiguous as to time.

12:04:40

10 Go ahead.

11 A. To the best of my recollection, the way that  
12 Wayne laid out his, his argument, he started talking  
13 about spinal cord research in cats, which is not  
14 anything we're doing at, at UW. But he, he was  
15 talking about spinal cord research that had been done  
16 in the past, and he said something along the lines of,  
17 I'm sure Dr. Sullivan would object or fight if someone  
18 came to take her cats, Sally and Thea, for, for this  
19 research.

12:04:59

20 Q. Okay. And that's -- and as I recall, and I  
21 just want to see if you recall the same thing, that  
22 the actual transcript of what his remarks were is in  
23 the record, either in this case or the prior lawsuit;  
24 correct?

12:05:21

25 ATTORNEY ROBERTS: Same objections as

12:05:34

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1 previous. Also, foundation. To the extent you are  
2 asking the witness about a document, you can put the  
3 document in front of the witness.

4 A. Yeah, I, I don't feel comfortable saying  
5 anything more without being able to refresh my memory  
6 with, with the actual document. That's, that's my  
7 best recollection of how it went.

12:05:46

8 Q. Okay. But to the extent that the transcript  
9 of that exchange is somewhere in the record, would you  
10 rely on the transcript or your own memory as to what  
11 was actually said?

12:06:01

12 ATTORNEY ROBERTS: Same objections as  
13 previous.

14 A. I'm telling you what I remember, to the best  
15 of my recollection.

12:06:10

16 (Exhibit 11 marked for identification.)

17 Q. The court reporter has just handed you what's  
18 been marked as Exhibit 11. And this is an email from  
19 Kevin Grossman at the UW Police Department to Sally  
20 Thompson-Iritani on January 8th, 2025; do you see  
21 that?

12:06:44

22 A. Yes.

23 Q. And did Dr. Thompson-Iritani keep you  
24 up-to-date on the status of UW police's investigation,  
25 to the extent there was one?

12:07:05

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1 ATTORNEY ROBERTS: Objection. Foundation.

2 Vague and ambiguous.

3 A. I was not on this particular email. I saw  
4 this message in a, in a Slack. It was copied in a  
5 Slack that should be part of the record. And I don't  
6 recall the date of, of that Slack message, when I saw  
7 this message from Kevin copied.

12:07:21

8 Q. Okay. But you were brought up to speed on  
9 the content of this email?

10 ATTORNEY ROBERTS: Objection. Vague, and  
11 mischaracterizes the witness's testimony.

12:07:41

12 A. In the Slack, that was, that was when I saw  
13 this.

14 Q. And in the email it says, "I wanted to let  
15 you know that our crime analyst, Kendra Borzio, did a  
16 search for the name in the email address associated  
17 with the concerning message and found nothing"; do you  
18 see that?

12:07:57

19 A. Yes.

20 Q. Okay. Do you know what the police department  
21 did to search for the name and email address?

12:08:08

22 A. No.

23 ATTORNEY ROBERTS: Objection. Foundation.

24 A. No.

25 Q. Do you know whether beyond searching for the

12:08:22

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1 name and email address the UW police department did  
2 any investigation concerning the email?

3 ATTORNEY ROBERTS: Same objection.

4 A. I don't know.

5 ATTORNEY HAWKES: The next exhibit. 12:09:34

6 (Exhibit 12 marked for identification.)

7 Q. The court reporter has handed you what's been  
8 marked as Exhibit 12. It's a rather long email chain.  
9 I think the one I want to ask about is closer to the  
10 end. Yes. Okay. So the next-to-the-last page, 12:10:25  
11 UW117, there's an email from Jennifer Iwamoto to Kevin  
12 Grossman on January 15th, 2025; do you see that?

13 ATTORNEY ROBERTS: And I'm just going to  
14 object to the extent that this is a long email string,  
15 which doesn't appear to have involved Dr. Sullivan. 12:10:54  
16 So to the extent she's being asked about it, I'd like  
17 to make sure she's had time to review it.

18 ATTORNEY HAWKES: Okay.

19 A. Okay.

20 Q. Okay. So going to that email I was just 12:11:48  
21 referring to, on 117, UW117. It says, "Hi Kevin,  
22 Thanks for meeting with us last week to talk about  
23 IACUC meeting logistics and security"; do you see  
24 that?

25 A. Yes. 12:12:07

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1 UW personnel on animal, what I characterize as animal  
2 extremist concerns?

3 ATTORNEY ROBERTS: Objection. Beyond the  
4 scope. Foundation.

5 A. Yeah, I don't know.

12:24:35

6 ATTORNEY ROBERTS: Relevance.

7 A. You'd have to ask the FBI.

8 Q. So can you describe in as much detail as you  
9 can what Special Agent Gonzales or any other FBI  
10 personnel who attended this meeting had to say about  
11 the email.

12:24:57

12 ATTORNEY ROBERTS: Objection. Vague.

13 Go ahead.

14 A. Yeah, I'm, I'm not clear about what I am --  
15 what's appropriate for me to share of the  
16 conversations that I've had with the FBI agent, so I'm  
17 not going to answer that.

12:25:11

18 ATTORNEY HAWKES: I don't believe that  
19 there's any privilege between UW and the FBI, so I  
20 think she needs to answer the question.

12:25:30

21 ATTORNEY ROBERTS: Can we take a break for  
22 a second?

23 ATTORNEY HAWKES: There's a question  
24 pending. I'd rather not.

25 ATTORNEY CREIGHTON: Could you repeat the

12:25:49

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1 question.

2 (Reporter read back as requested the  
3 question that was pending.)

4 ATTORNEY ROBERTS: I mean, I'm going to  
5 object to it, based on relevance, but I'm not going to  
6 instruct you not to answer the question as asked.

12:26:15

7 A. Okay. So I will just -- so Kenna said that  
8 the FBI could neither confirm nor deny that they were  
9 taking any action in this case.

12:26:43

10 Q. Anything else that she said about anything  
11 that the FBI may or may not have been doing in  
12 response to the email?

13 ATTORNEY ROBERTS: Objection. Asked and  
14 answered.

15 A. They just asked us to please keep them  
16 informed.

12:26:56

17 Q. Did Special Agent Gonzales characterize the  
18 email as a threat?

19 ATTORNEY ROBERTS: Objection. Foundation.  
20 Speculation.

12:27:15

21 A. She could neither confirm nor deny that the  
22 FBI was investigating.

23 Q. Did Special Agent Gonzales participate in any  
24 discussions about security for future IACUC meetings?

25 ATTORNEY ROBERTS: Objection. Vague and

12:27:36



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1 who was around as we came and went.

2 Q. Anything else, that you can recall?

3 ATTORNEY ROBERTS: Objection. Vague.

4 A. No. And some of what I just said, so, as I'm  
5 thinking more about those conversations, at least some  
6 of, some of that advice was also coming from the other  
7 agent that was sitting with, with Kenna on the, on the  
8 Zoom.

12:29:22

9 Q. Okay. What was the input from the UW Police  
10 Department at this meeting? Did they have anything to  
11 say?

12:29:44

12 A. They, they agreed to, to work with us, and to  
13 try to find a secure location for our public meeting  
14 space.

15 Q. Did they indicate whether they had taken any  
16 investigation into the email?

12:29:59

17 A. I don't think they specifically said that  
18 they were, were looking into anything beyond the --  
19 having that IT person try to see if they could get any  
20 information from the, the header of the, the email.

12:30:23

21 Q. Did anyone from the UW Police Department  
22 characterize the email as a threat?

23 A. I don't recall.

24 Q. I think you mentioned that there was a --  
25 well, let me back up for a second.

12:30:51

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1 Also misstates the witness's testimony.

2 Mischaracterizes the document.

3 A. We discuss it when it's relevant.

4 Q. What in your view makes someone an animal  
5 extremist? 12:53:25

6 A. Certainly someone who thinks that no animal  
7 should be used in research.

8 Q. So that makes -- so would you say that  
9 everyone who fits that definition is someone who is  
10 likely to engage in violence? 12:53:47

11 ATTORNEY ROBERTS: Objection. Vague.  
12 Foundation. Mischaracterizes the witness's testimony.

13 A. Yeah, I can't predict which subset is gonna  
14 be violent, which is exactly why I'm so afraid when I  
15 see this kind of menacing message. I don't know  
16 whether to take this person seriously or, or not. 12:54:01

17 Q. Okay. But there are -- and I think you  
18 mentioned, you know, Dr. Johnson might be somebody who  
19 falls into this bucket. But there are people that you  
20 would characterize as animal extremists who you are  
21 not worried are going to engage in violence; is that  
22 fair to say? 12:54:18

23 ATTORNEY ROBERTS: Objection to the extent  
24 it mischaracterizes the witness's testimony.

25 A. I'm sure there are some. 12:54:31

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1 organization?

2 A. Yes, I do.

3 Q. To your knowledge, has NARN ever engaged in  
4 any violent activities?

5 ATTORNEY ROBERTS: Objection. Foundation. 12:56:27

6 A. I'm not aware of them.

7 Q. Under that same standing item, it says,  
8 "Meeting this afternoon regarding email received last  
9 month"; do you see that?

10 A. I do. 12:57:00

11 Q. Okay. Do you remember discussing that a  
12 meeting on January 7th, regarding the December 12th  
13 email?

14 A. Again, I, I don't remember any specifics  
15 about particular meetings on particular dates. 12:57:15

16 Q. Do you recall any, participating in any  
17 meetings about the December 12th email, other than the  
18 ones that we've already discussed here today?

19 ATTORNEY ROBERTS: Objection. Vague.

20 A. Yeah, I'm -- I suspect that it was discussed 12:57:39  
21 at other, at other meetings, but I don't know. It is  
22 a topic that comes up with some regularity these days.

23 Q. Okay. And then right under that it says, "JS  
24 contemplating reaching out. Could we learn  
25 something?" Is that a reference to you? 12:58:04

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1 A. Yes.

2 ATTORNEY ROBERTS: Objection. Foundation.

3 A. Yes, it is.

4 Q. Okay. So you were contemplating reaching  
5 out. What did you mean -- or what do you understand  
6 that to mean?

12:58:11

7 A. So you have an email document of the, the  
8 message that I drafted back to the person who sent the  
9 menacing email. I was very aware of the fact that we  
10 had a lot of people who were very afraid. We had a  
11 lot of meetings. A lot of people involved with trying  
12 to figure out how to move forward safely, and we  
13 really didn't know what, what to make of this, of this  
14 message. Is it, is it as, truly as menacing and  
15 perhaps even threatening the way some people  
16 interpreted it, or is it possible that this was  
17 someone who just had a really bad day?

12:58:28

12:58:50

18 And so I thought that if we could have any  
19 kind of interaction with that person, it would help us  
20 understand better where, where they were coming from.  
21 Sort of assess the threat level.

12:59:11

22 And I also am aware that there are many  
23 people out there who, who get misinformation from  
24 PETA, and become, you know, very concerned, very  
25 worried, very angry because they believe that we are

12:59:32

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1 they might have that this was leading them to think  
2 that we were harming animals. And so I drafted a  
3 message that I hoped would elicit a response to engage  
4 in a conversation, and as far as I know, we never  
5 heard anything back. But I, I drafted that message,  
6 and then it was sent back through the same email  
7 account that the menacing message was received.

13:01:36

8 (Exhibit 18 marked for identification.)

9 Q. And you've just been handed Exhibit 18, which  
10 is an email from you to Jennifer Iwamoto on  
11 January 10th. This appears to be a draft of the email  
12 that you were just referencing; is that right?

13:02:07

13 A. It's the text for the response, yes.

14 Q. And that was then sent back to the email  
15 address to which the original email was sent?

13:02:24

16 A. Yes.

17 Q. Okay. I want to go back to Exhibit 7, just  
18 for a second. We spent some rather contentious time  
19 talking about the list of precautions that begins at  
20 UW54. And I wanted to ask if, did you have any  
21 conversations with anyone on the IACUC or any  
22 alternate IACUC members subsequent to this going out  
23 to them about whether they should adopt any of the  
24 measures listed here?

13:02:51

25 ATTORNEY ROBERTS: Object to the extent

13:03:15

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1 it's compound. Vague. Asked and answered.

2 Go ahead.

3 A. No.

4 Q. Okay. Did you have any discussions with any  
5 IACUC members or alternates after the December 12th  
6 email came in about what personal security measures  
7 they should or should not adopt?

13:03:28

8 ATTORNEY ROBERTS: Same objections.

9 A. Making the decision to go remote, meant that  
10 I was no longer afraid for the safety of my IACUC  
11 members at the meetings. My focus was on the safety  
12 of the OAW staff member, who would be in the, in the  
13 public meeting space. That was the focus for my --  
14 for security issues, and we focused on making it a  
15 safe space.

13:03:51

13:04:12

16 Q. So that's a no?

17 ATTORNEY ROBERTS: Objection.

18 A. Can you reask your question.

19 Q. I think it was a questions yes-or-no  
20 question.

13:04:28

21 ATTORNEY HAWKES: Can you reread the  
22 question before her last answer.

23 (Reporter read back as requested the  
24 question that was pending.)

25 ATTORNEY ROBERTS: Object to the form.

13:04:51

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C E R T I F I C A T E

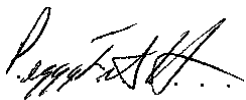
STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF KING )

I, the undersigned Registered Professional Reporter and Washington Certified Court Reporter, hereby certify that the foregoing deposition upon oral examination of JANE SULLIVAN, Ph.D. was taken before me on February 28, 2025 and transcribed under my direction;

That the witness was duly sworn by me pursuant to RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for, nor a relative or employee of, any of the parties to the action or any attorney or counsel employed by the parties hereto, nor financially interested in its outcome.

I further certify that in accordance with CR 30(e), the witness was given the opportunity to examine, read, and sign the deposition, within 30 days, upon its completion and submission, unless waiver of signature was indicated in the record.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this date: March 6, 2025.



\S\ PEGGY FRITSCHY HAMILTON, RPR, CSR

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